UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

PLAINTIFF,

CASE NO.: 1:21-CR-00371-BMC-TAM

V.

AL MALIK ALSHAHHI, ET AL.,

DEFENDANTS.

DEFENDANT THOMAS J. BARRACK, JR.'S JOINDER IN NON-PARTY ALISON MARCKSTADT'S MOTION TO QUASH RULE 17(C) SUBPOENA

Defendant Thomas J. Barrack, Jr., joins in non-party Ms. Alison Marckstadt's motion to quash the Rule 17(c) subpoena that the government served on her. Ms. Marckstadt was a central member of Mr. Barrack's defense team for eight months and worked closely with counsel to collect information, analyze issues, and prepare Mr. Barrack's defense for trial. *See* Mot. to Quash 3-5 (ECF No. 186-1). The government's subpoena threatens to invade Mr. Barrack's relationship with counsel by seeking material protected by the attorney-client privilege and work-product doctrine. Mr. Barrack accordingly joins in Ms. Marckstadt's motion to quash the government's subpoena.

Dated: September 12, 2022

WILLKIE FARR & GALLAGHER LLP

By: /s/ Michael S. Schachter

Michael S. Schachter Randall W. Jackson Casey Donnelly Steven Ballew Jordan Reisch 787 Seventh Avenue New York, New York 10019

Phone: (212) 728-8000

Email: mschachter@willkie.com

O'MELVENY & MYERS LLP

James A. Bowman (admitted *pro hac vice*)
400 South Hope Street, 18th Floor
Los Angeles, CA 90071

Telephone: (213) 430-6000 Facsimile: (213) 430-6407 E-mail: jbowman@omm.com